

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON INC  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

---

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS WITHOUT PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-C and defendant American Medical Systems, Inc., (“AMS”) jointly move the court to dismiss AMS without prejudice and terminate them from the docket of the court, parties to bear their own costs. Other defendants remain in this action, and plaintiffs will continue to pursue this action against them.

Respectfully:

/s/ Barbara Binis

Barbara Binis  
Stephen J. McConnell  
REED SMITH  
Three Logan Square, Suite 3100  
1717 Arch Street  
Philadelphia, PA 19103  
215.851.8100 (phone)  
215.851.1420 (fax)  
bbinis@reedsmith.com  
smcconnell@reedsmith.com

/s/ Erik W. Legg

Erik W. Legg  
FARRELL WHITE & LEGG  
P. O. Box 6457  
Huntington, WV 25772-6457  
304.522.9100 (phone)  
304.522.9162 (fax)  
EWL@farrell3.com

*Attorneys for Defendant American Medical Systems, Inc.*

/s/ Karolina S. Kulesza

Karolina S. Kulesza  
DRIGGS BILLS & DAY  
331 South 600 East  
Salt Lake City, UT 84102  
801.363.9982 (phone)  
801.931.2552 (fax)  
kkulesza@lawdbd.com  
*Attorney for Plaintiffs on Exhibit A*

/s/ Michael Gallant

Michael Gallant  
KELLEY BERNHEIM & DOLINKSY  
Fourth Floor  
2200 Pennsylvania Avenue, NW  
Washington, DC 20037  
202.379.0680 (phone)  
202.379.0685 (fax)  
mgallant@duejustice.com  
*Attorney for Plaintiffs on Exhibit B*

/s/ Babak Bobby Saadian

Babak Bobby Saadian  
WILSHIRE LAW FIRM  
12th Floor  
3055 Wilshire Boulevard  
Los Angeles, CA 90010  
213.381.9988 (phone)  
213.381.9989 (fax)  
masstorts@wilshirelawfirm.com  
*Attorney for Plaintiff on Exhibit C*

Dated: April 3, 2019

**EXHIBIT A – DRIGGS BILLS & DAY**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:15-cv-12541	Priscilla Cruz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-cv-14339	Marlene Griefff v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-cv-14404	Lisa M. Sa'u, Bradlee M. Sa'u v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:16-cv-06210	Nell Christine Higgs, Michael Higgs v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT B – KELLEY BERNHEIM & DOLINKSY**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:15-cv-14824	Mary Rose, Harold Lee Rose v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT C – WILSHIRE LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:16-cv-06344	Glenda Baker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis